

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

LAURIE GARLAND, an individual,

Plaintiff,

v.

STATE OF OKLAHOMA EX REL.

OKLAHOMA DEPARTMENT OF

CORRECTIONS, ET AL.,

Defendants.

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Case No. CIV-20-306-RAW

JOINT MOTION FOR AGREED PROTECTIVE ORDER

COME NOW, Plaintiff Laurie Garland and Defendants Christopher Redeagle, Oklahoma Department of Corrections, Oklahoma Board of Corrections, Sharon McCoy, Penny Lewis, Rabekah Mooneyham and Heather Carlson, collectively “the Parties”, by and through undersigned counsel and pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, and ask that the Court enter an Agreed Protective Order to govern the production of confidential information throughout the course of this litigation.

1. The Parties have been and are currently engaged in written discovery and document production.
2. Certain documents and information have been requested in this case which the Parties believe to be sensitive or confidential, including government records, personnel files, medical records, videos, photographs, policies and procedures, law enforcement reports, tax returns and other financial documents. These documents contain personal data identifiers, protected health information, could pose a security risk and could involve sensitive

information of third-parties.

3. The Parties have conferred and agreed to protect against the disclosure of certain information to certain persons outside of this case through the proposed Agreed Protective Order.
4. Attached hereto as Exhibit 1 is a copy of the Parties' proposed Agreed Protective Order.

WHEREFORE, all premises considered, the Parties respectfully request this Court Grant their Motion and enter the Agreed Protective Order that is being submitted contemporaneously with this Joint Motion.

Respectfully submitted,

/s/ M. Henry Dalton

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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of February, 2021, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of the Notice of Electronic Filing to the following ECF registrants:

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